

DANIEL G. BOGDEN  
United States Attorney  
District of Nevada  
SUSAN CUSHMAN  
Assistant United States Attorney  
501 Las Vegas Boulevard South  
Suite 1100  
Las Vegas, Nevada 89101  
702-388-6336

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,	)	
	)	Case No.: 2:16-cr-0030-JAD-CWH
Plaintiff,	)	
	)	STIPULATION TO CONTINUE
vs.	)	SENTENCING
	)	(First Request)
JULIAN CRUZ-FLORES,	)	
	)	
Defendant.	)	

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel Bogden, United States Attorney; Susan Cushman, Assistant United States Attorney, counsel for the United States of America and Mace Yampulsky, Esq. counsel for defendant, that sentencing in the above-captioned matter currently scheduled to commence on Tuesday, January 3, 2017, at 9:00 a.m. be vacated and continued to a date and time convenient to all parties, but no earlier than 60 days.

This Stipulation is entered into for the following reason:

1. The parties need additional time to determine whether the defendant meets the criteria set for group plea reduction pursuant to *United States v. Caro*, 997F.2d 657 (9<sup>th</sup> Cir. 1993).
2. The parties agree to the continuance.
3. The defendant is in custody and does not object to the continuance.

4. This is the first request to continue the sentencing.

DATED this 20th day of December, 2016.

Respectfully submitted,

DANIEL G. BOGDEN  
United States Attorney

/s/ Susan Cushman

---

SUSAN CUSHMAN  
Assistant United States Attorney

/s/ Mace Yampulsky

---

MACE YAMPULSKY  
Counsel for Defendant

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

-oOo-

UNITED STATES OF AMERICA,

Plaintiff,

vs.

JULIAN CRUZ-FLORES,

Defendant.

Case No.: 2:16-cr-0030-JAD-CWH

ORDER TO CONTINUE  
SENTENCING

Based on the pending Stipulation of counsel, and good cause appearing therefore, the Court hereby orders that sentencing in the above-captioned matter be vacated and continued until March 6, 2017 at the hour of 10:00 a.m.

DATED this 20th day of December, 2016.

  
UNITED STATES DISTRICT JUDGE